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John D. Tressler, Leader
Regulator Management Group
Office of the Chief Information Officer
Department of Education
400 Maryland SW ROB-3
Washington, DC 20202

Dear Mr. Tressler:

I am writing to comment on the application by the National Center for Education Statistics (NCES) request for a three year clearance for the Integrated Postsecondary Education Data System (IPEDS).

I write you as the head of a nationally recognized accrediting association and the Executive Vice-President of an association of small institutions which are subject to the proposed data collection service. I have participated, for many years, in NCES/SHEEO meetings and I would note at the outset that I have witnessed a continued increase in sophistication and expertise in the collection of data, guided by people who are both technically expert and professional in their attitude. The Department is to be congratulated on the quality of individuals who have been given the responsibility for carrying out this mandate.

1. Is there a need for a three year clearance?

Given the fact that the Higher Education Act will be authorized in 2003 or 2004 at the latest, would it not make sense to authorize a one year clearance and revisit the situation, keeping in mind any new responsibilities or restrictions emanating from the new Act?

2. Can the burden be reduced?

Given the fact that except for one or two narrow Congressional mandates, the use of this data is to draw broad-based conclusions, could the intense, comprehensive collection of data be replaced by statistical sampling? And if sampling is not possible for all the elements of IPEDS, can it be done for some?

Some of the data being collected is intended for postsecondary education planning at the state and local level. Is there any justification for NCES to impose a data collection burden on institutions for purposes which are not Congressionally mandated?

Is it possible that extremely small institutions – such as the schools I serve – could submit data collectively? The total number of students in the entire universe of our schools is about 8000 – the size of about one moderately sized conventional college. Is there a need for every institution, no matter how small, to undertake the burden of gathering data and submitting it on an annual basis? Could we as an association, use our own database for some items, gather information for others, and submit information for the community as a whole?

In this connection, I would note that many such small institutions do not have to submit an audit each year, so that submitting the Finance survey on an annual basis is a costly burden.

Finally, it is worth mentioning that the categories developed for the total universe of postsecondary institutions do not always match those in use at our schools. Would it be possible to superimpose a screen with definitions and categories suitable to our schools to help reduce the time burden associated with submitting accurate and informative data?

3. Some troubling phrases and requests

Why is NCES “requesting the e-mail address of the CEO and the link to the institution’s mission statement”? Is there a data collection need which this request will address?

Does the Department feel that it is “highly trained manpower that is the outcome of a postsecondary education program”? While there is a significant proportion of the postsecondary community which is, indeed, training people, traditional higher education is in the business of preparing minds. The difference is not just one of nomenclature.

In describing the Fall Staff survey, the Department speaks of using data “in examining the health of the institutions.” I would respectfully submit that this is not within the purview of NCES. The health of a postsecondary institution can be determined only after an exhaustive and complex review by peers, acting through the accreditation process and other assessments by experts in the particular narrow universe of similar institutions.

4. Who uses the information?

The general trend of NCES to work closely with state coordinators is highly commendable. Yet, there is concern here too. Increasingly, we read of states obtaining data on a student unit record basis. Indeed, I have witnessed some of the outcomes of state utilization of unit records and am extremely troubled by the total loss of privacy which results. Combining student records with readily available databases relating to voter registration, health records, employment, motor vehicles, and institutionalization records, jeopardizes the privacy to which all citizens are entitled. Since some states use

unit data to prepare IPEDS reports, is it possible for NCES to help ensure that information gathered not contribute to this dismaying loss of individual privacy?

5. The need for this data

The cost of this major data collection must be weighed against the benefits. Simply naming agencies which use the data does not suffice. The Department should be requesting far more detailed evidence of the need for this data and its use. Note, I do not in any way deny that this data is being used. But a study should be made to determine whether all the elements of all the surveys are necessary – and whether the information sought by these other agencies cannot be obtained in a less burdensome manner. NCES should determine how much information each agency needs, whether they need it every year, whether details are needed – or whether a statistical sample would suffice.

6. Consultations outside the agency


As noted above, I have been invited over a period of many years to participate in the NCES/SHEEO gatherings. I have been received graciously and my comments – sometimes critical - have been received in a professional and collegial manner.

At the same time, I wonder whether NCES should expand its conversations with the institutions themselves. A review of the list of participants in these conversations notes that it is “institutional researchers and registrars” who are part of the technical review panel.

NCES has indeed accelerated its dialogue; I would respectfully suggest that it expand it at the same time to include administrators who are concerned with the cost and burden of gathering and supplying this information, as well as with faculty members who can provide the essential input of higher education and perhaps help design a data collection strategy which is useful to institutions as a whole.

Thank you for this opportunity to be part of a most valuable process.

Sincerely,


Dr. Bernard Fryshman